

**NR 700 Series Issues for Discussion with Technical Focus Group  
(previously discussed by SS Team)**

1. DRO standard	We received a recommendation to retain the DRO standard, at least for limited applications where compound-specific criteria are impractical. It is commonly used as an efficient and cost effective tool in the investigation and remediation of transformer oil releases.	This situation was discussed by the RRMT, the decision was to proceed with elimination of GRO/DRO soil standards. Team wants to promote use of GRO/DRO for screening. Rule includes site-specific flexibility in investigation, interim and remedial actions and closure decisions (708 and 726).
2. Hydro definition in NR712	<p>Discussed 3 options:</p> <p>1. existing hydro defin. = a person who is a graduate of an accredited institution of higher education and who has successfully completed 30 semester hours or 45 quarter hours of course work in geology. At least 6 semester hours or 9 quarter hours of the geology course work shall be hydrogeology, geohydrology or groundwater geology. This person shall also have acquired, through education and field experience, the ability to direct the drilling of borings and the installation and development of wells, describe and classify geologic samples and evaluate and interpret geologic and hydrogeologic data.</p> <p>2. NR 500 = <a href="#">registered professional geologist</a> = means a professional geologist registered with the Wisconsin examining board of architects, professional geologists, engineers, designers and land surveyors.</p> <p>3. draft NR 600 = <a href="#">qualified groundwater scientist</a> = means a scientist or engineer who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and has sufficient training and experience in ground-water hydrology and related fields as may be demonstrated by state registration, professional certifications or completion of accredited university courses that enable that individual to make sound professional judgments regarding ground-water monitoring and contaminant fate and transport.</p>	Team discussion focused on the "hydrogeologist" definition and the "qualified groundwater scientist" definition. Concern with QGS due to some people signing off, without education or experience in hydrogeology, because they are registered geologists, or an engineer. Agree that hydrogeology education/experience necessary for work conducted under NR 716/726.
3. GRO/DRO screening	If we promote use of GRO/DRO for screening purposes, do we need to specify the method, and require use of a certified lab?	Team agreed to keep requirement for Wis. Modified GRO/DRO, and to require use of a certified lab, for now. Need to know validity of data provided mainly for tank pulls

		and spills (immediate actions). Maintain language on method and lab certification, modify only for NR 149 update.
4. revise soil definition	Intent is to revise soil definition to account for contaminated soils in the smear zone. Three options discussed – narrow definition adding smear zone soils, broader definition allowing for any contamination, and a federal type definition that references both saturated and unsaturated materials.	Pending further discussion. Not comfortable with federal type definition, as impacts would be much broader than intent. To discuss with Commerce.
5. storage devices	Need to determine whether to address in rule or not.	Will address in rule. Potential reference to methods. Product names still to be eliminated.
6. Add conceptual model to NR 716	Intent is to add to NR 716 to reduce instances of "petroleum" approach being applied to chlorinated cases. Based on recommendation from "Limits of NA for Chlorinated Guidance". Some other states/feds using a definition and requirements.	Discuss with TFG. Would this help, or do 'evaluation' requirements already address the need?
7. Geochemical parameters	Require that sampling/analysis be done for indicator parameters for NA. Compounds not specified.	Team agreed.
8. a. Require downgradient piezometers  b. Sample saturated soil in source area	a. discussed addition of rule language requiring use of a downgradient piezometer when groundwater is contaminated. Concern with piez. in source area and for situations where dg piez. may not be needed.  b. require sampling in residual 'source zone' to better define mass of residual contamination	a. Most of team OK with concept. Remove "dg", add qualifier for some situations.
9. modify NR 716 reference	Reference DNR GW Sampling guidelines instead of SW 846 for gw sampling.	Ok if referencing gw.
10. Holding times	Table of holding times may not be needed. Replace with reference to sampling methods/guidance.	Team agreed to replacement of table if adequate references can be found.
11. Specify base map	Require use of the groundwater elevation map as the base map for the groundwater plume map.	Most of the team OK with concept.